



159 360

INFORMATION REQUESTS (to Sauget & Company)

Sauget & Co. is a dissolved corporation, consequently, the information provided in the following answers was obtained from Mr. Paul Sauget, a former shareholder and officer of Sauget & Co.

1. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such person.

ANSWER NO. 1: The following individuals at various times worked for Sauget & Company. Except as indicated, the present whereabouts of most of these individuals is, however, unknown.

Aaron Reed
Al Crosse
Alfred Bazile (East St. Louis/Edgemont)
Alvin Clain
Art Hubbs
B. Similey
Bennie Williams
Bernie Hare (deceased)
Bill Ledbetter (Cahokia, Illinois)
Billy Bethea (Village of Sauget)
Billy Ticer (Southern Illinois area)
Bobbie Robinson
Bobby L. Dailey
Carl L. Conley
Charles Foshee
Charles Lee Polwell
Charles Rippee (St. Louis, MO; or Menard, Chester, IL)
Charlie Fenton
David Goessling
Darle Dobson
Darrell Kessinger
David Calahan (Cahokia, IL)
David W. Jestus
Don Manning (Cahokia, IL)
Edward F. Holton (Columbus, IL)
Frank Tillman (deceased)
Fred Dunning
Fred McFadden Jr.

Gary Lyles
Gene Shields
Gilbert Mc Gee
Greg Mathiesen
Henry Collins
Henry Tillman
J. W. Jones
James Brawley
James McDaniel (Columbia, IL)
James McFadden
James O. Richards (St. Louis, MO)
James Turner
Jeffery A. Lane (Cahokia, IL)
Jessie Cross (East St. Louis)
Jerry Cross
Jay Van Evera (Southern Illinois area)
Jessie Guesh
John Alred
John H. Palmer
John Walker
John Williams (Village of Sauget)
Johnnie Hardiman
Joseph Beasley
Kenneth Privett
L.T. Ross
Leroy Prevett
Lloyd Sansoucie (Cahokia, IL)
Matt Brown (Cahokia, IL)
Mark McDaniel (Belleville, IL)

Mark Danback
McKinley Moore
Mike Martin
Mike Gutterman
Monte Bordeaux
Norman McClusky
Ollie Reeves (Village of Sauget)
Richard J. Heine
Richard Ticer (deceased)
Roderick Austin
Roger Thornton (Village of Sauget)
Sammie Lee Rogers
Sandra Wright (deceased)
Sheddy Johnson
Steven Rippe

Ted Bridger
Ted Tucker
Thomas Cates (Edwardsville, IL)
Thomas Clanin
Timothy P. Cates (Village of Sauget)
Tom Dixon (deceased)
Victor Nordike (Cahokia, IL)
Walter Stewart
Walter Lee Jr.
Wiley Scott (deceased)
William Leach
William Myles
William Steele
Willie Lee Pleas
Willie Owens

2. Did you ever use, purchase, store, treat, dispose, transport, or otherwise handle any hazardous substances or materials at or to the Site?

ANSWER NO. 2: Sauget & Co. does not have knowledge as to whether the waste used, purchased, stored, treated, disposed, transported or otherwise handled at or to the Site constituted hazardous substances or materials. Generally, the type of waste accepted was paper, wood, general rubbish, food wastes, construction waste (e.g. concrete, brick and wood). At times, drums or containers of waste were accepted, but as there were no manifesting requirements applicable at the time to designate wastes as either non-hazardous or hazardous and no tests were performed on the waste which was accepted, Sauget & Co. does not know whether any of the particular wastes accepted at the Site would be deemed "hazardous substances or materials" under the CERCLA definition referenced in the instructions to these requests.

3. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. In addition, identify the following:

- (a) The persons with whom you or such other person made such arrangements;**
- (b) Every date on which such arrangements took place;**
- (c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;**

- (d) The owner of the waste materials or hazardous substances so accepted or transported;
- (e) The quantity of the waste materials or hazardous substances involved (weigh or volume) in each transaction and the total quantity for all transactions;
- (f) All tests, analyses, and analytical results concerning the waste materials;
- (g) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- (h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- (i) Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- (j) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- (k) What was actually done to the waste materials or hazardous substances once they were brought to the Site;
- (l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- (m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substances involved in each transaction;
- (n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
- (o) The price paid for (i) transport or (ii) disposal or (iii) both of each waste material and hazardous substance;
- (p) All documents containing information responsive to (a) - (o) above, or in lieu of identification of all relevant documents, provide copies of all such documents; and
- (q) All persons with knowledge, information, or documents responsive to (a) - (o) above.

ANSWER NO. 3: See Answer to Request No. 2 with respect to hazardous substances. Previously, Sauget & Company operated an IEPA-permitted landfill in Sauget which was bordered on the west by the Illinois Central Gulf Railroad tracks; on the south by Monsanto

Avenue; and on the east by the Terminal Railroad Association. That landfill is now referred to as Site "P". In conducting the records search for response to this Information Request as to Site Q, documents were located which referenced disposal of materials at a "landfill", but did not however, indicate whether that would have been the properties which are now referred to as Site Q or Site P, respectively. For purposes of this Response, we have included the names of all entities disclosed on such documents as well as those entities identified by general recollection. Subject to and based on the foregoing, Sauget & Co. had the following customers:

- AAlco Wrecking
- Abco Trash Service
- Able Sewer Service
- Ajax Hickman Hauling
- Banjo Iron Company
- Becker Metals
- Belleville Concrete Com.
- Bi-State Development Agency
- Boyer Sanitation
- Browning-Ferris Industries
- C & E Hauling
- Cahokia Unit School District No. 187
- Cargill, Inc.
- Centry Foundry
- Century Electric Company
- Chas. Bailey
- Circle Packing Co.
- City of East St. Louis
- Clayton Chemical
- Commercial Sanitation
- Corkery Fuel Co.
- David Hauling
- Disposal Service Company
- Dore Wrecking
- Dotson Dispose "All Service"
- East St. Louis Park District
- Edgemont Construction Co.
- Edwin Cooper, Inc.
- Eighth & Trendley Metal Co.
- Evans Bros.
- Fairmont City
- Finer Metal Company
- Fish Disposal
- Fruin-Conlon Corp.
- Hart Roofing
- Hayden Wrecking
- Hilbert C. Fournie
- Hilltop Hauling

- Hueffmeier Bros.
- Hunter Packing Co.
- Illinois State Highway Department
- M. Coppersmith
- Thomas Byrd
- Village of Brooklyn
- Monsanto
- Mobil Oil Company
- C. Belle
- Roy Baur
- Atlas Service Co.
- American Zinc Co.
- Midwest Sanitation
- All-Rite Sewer
- Archway
- Mississippi Valley Control
- Salvation Army
- St. Louis Sewer
- Lefton Iron & Metal
- Gibson Hauling

Sauget & Company obtained from Midwest Rubber Company cinders to use as cover material at the Site. Sauget & Company also obtained cover material, dirt and stone for the Site from East St. Louis Stone Company. (See documents Bates No. SQ 001709 to 002079) There may have been other haulers who brought waste to the Site but we do not recall their names. With respect to the customers identified above, we do not know whether they or someone else arranged for disposal or treatment or arranged for transportation for disposal or treatment of the waste materials. We only know the identity of the entity who brought the waste to the Site. With respect to the subparagraphs of this request, Sauget & Co. answers as follows:

(a) Sauget & Co. did not make the arrangements. It merely oversaw the disposal of waste after it was brought to the Site.

(b) We do not recall.

(c) We do not recall each transaction. See response to Request No. 2 regarding the nature of the waste material accepted at the Site.

(d) We do not know who had ownership of the waste materials accepted or transported.

(e) We do not recall.

(f) None were conducted.

(g) We do not know.

(h) We do not recall the amounts paid for each transaction but typically the payments were by check, but some may have been made by cash. See also documents produced with respect to subparagraph (p) below which are responsive to this subparagraph. We do not recall the identity of the person from whom payment for each transaction was received.

(i) Not applicable.

(j) We have no knowledge of any such transshipping activity.

(k) Once the waste materials were brought to the Site, they were typically spread out in a particular area of the Site and then covered. If the waste material included metal scrap of some sort, such metal scrap material was typically segregated and then transported to a scrap salvage operation.

(l) See response to subparagraph (k) above.

(m) See response to subparagraph (k) above.

(n) We do not recall the number of containers or the markings, if any, on containers. The containers did include drums and boxes.

(o) We do not recall the prices paid for disposal. In most instances, the pricing was by the load. See documents produced in response to subparagraph (p) below which are responsive to this subparagraph. We did not engage in any transporting of waste to the Site and hence, there was no pricing schedule for transporting waste material to the Site.

(p) See enclosed documents Bates No. SQ000427 to SQ000473; SQ000475 to SQ000860; SQ000863 to SQ000927; SQ000929 to SQ001125; SQ001129; SQ001131 to SQ001214; SQ001217 to SQ001477; SQ 001490 to SQ001698A; SQ001708 to 002079; SQ 002080 to SQ 002316.

(q) Paul Sauget. There may be persons at the customer entities listed in response to this request who have responsive knowledge, information or documents but we do not know their identity.

4. Have you or any other person working with you or on your behalf ever accepted hazardous substances or waste materials for transportation to the Site from any person? If the answer to this questions is anything but an unequivocal no, identify:

(a) The persons from whom you or such other persons accepted waste materials for transport to the Site;

(b) Every date on which waste materials or hazardous substances were accepted or transported;

(c) For each transaction, the nature of the hazardous substances or waste materials accepted or transported, including the chemical content,

characteristics, physical state (e.g., solid, liquid), and the process for which the material was used or the process which generated the material;

- (d) For each hazardous substance or material, describe any warnings given to you with respect to its handling;
- (e) The owner of the hazardous substances or materials so accepted or transported;
- (f) The quantity of the hazardous substance or material involved (weigh or volume) in each transaction and the total quantity for all transactions;
- (g) All tests or analyses and analytical results concerning each hazardous substance or material;/ and
- (h) The price charged for transport and/or disposal per drum, barrel, container, or load (or whatever unit used) of hazardous substance or waste materials brought to the Site.

ANSWER NO. 4: See Answer to Request No. 2.

5. Identify all liability insurance policies held by Respondent from 1955 to the present which relate to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

ANSWER NO. 5: See enclosed documents Bates No. SQ000001 to SQ000109. In addition, on behalf of Sauget & Co., Paul Sauget has contacted the insurance brokers for the earlier and later year policies which are not currently in his possession. These additional policies will be produced as soon as they become available.

6. Provide copies of all income tax returns as filed sent to the Federal Internal Revenue Service in the last three years.

ANSWER NO. 6: Not applicable. Sauget & Co. was registered to do business in Illinois from November 9, 1959 to November 15, 1973. Sauget & Co., a Delaware Corporation, was incorporated on or about October 27, 1959 and was involuntarily dissolved on or about March 1, 1984.

- 7. If Respondent is a Corporation, respond to the following requests:**
- (a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.**
 - (b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service.**
 - (c) Identify all of Respondent's current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.**

ANSWER NO. 7: See Answer to Request No. 14.

- 8. If Respondent is a Partnership, provide copies of the Partnership Agreement.**

ANSWER NO. 8: Not applicable.

- 9. If Respondent is a Trust, provide all relevant agreements and documents to support this claim and:**

- (a) The names and addresses of all current trustees;**
- (b) The names and addresses of all current beneficiaries.**

ANSWER NO. 9: Not applicable.

- 10. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.**

ANSWER NO. 10: Sauget & Co. does not know of any such acts or omissions.

- 11. If Respondent ever has conducted business under any other name:**

- (a) List each such name; and**
- (b) Provide the dates during which Respondent used such name.**
- (c) If Respondent is a corporation, provide:**

- (d) **The date of incorporation; and**
- (e) **The state of incorporation.**

ANSWER NO. 11: We are still awaiting information requested from the Illinois Secretary of State's office, however, in the meantime, we believe that Sauget & Co. previously conducted business under the name Industrial Salvage & Disposal, Inc. Industrial Salvage & Disposal, Inc. was registered to do business in Illinois on November 5, 1959 and its name was changed to "Sauget & Company" on March 25, 1965.

12. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each corporate relationship, including but not limited to:

- (a) **A general statement of the nature of the relationship;**
- (b) **The date such relationship existed;**
- (c) **The percentage of ownership of Respondent that is held by such other entity; and**
- (d) **For each such affiliated entity provide the names and complete addresses of its parent, subsidiary and otherwise affiliated entities.**

ANSWER NO. 12: Not applicable.

13. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

ANSWER NO. 13: See Answer to Request No. 11.

14. If Respondent no longer exists as a legal entity because of dissolution provide:

- (a) **A brief description of the nature and reason for dissolution;**
- (b) **The date of dissolution;**
- (c) **Documents memorializing or indicating the dissolution of the entity;**
- (d) **A statement of how and to whom the entity's assets were distributed.**

ANSWER NO. 14: Sauget & Co. was involuntarily dissolved as a Delaware corporation on or about March 1, 1984 and the remaining, if any, assets were distributed to MTS Inc.

15. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

- (a) The title and dates of the documents that embody the terms of such transaction (i.e., purchase agreements, merger and dissolution agreements, etc.);**
- (b) The identities of the seller, buyer and any other parties to such transaction; and**
- (c) A brief statement describing the nature of the asset purchases and mergers.**

ANSWER NO. 15: Not applicable.

16. If Respondent has filed for bankruptcy, provide:

- (a) The U.S. Bankruptcy Court in which the petition was filed;**
- (b) The docket number of such petition;**
- (c) The date the bankruptcy petition was filed;**
- (d) Whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or another provision; and**
- (e) A brief description of the current status of the petition.**

ANSWER NO. 16: Not applicable.

17. Has the Respondent submitted information to other federal, state or local regulatory agencies, including but not limited to the Illinois Pollution Control Agency, Illinois Environmental Protection Agency, U.S. Department of Labor, or U.S. Department of Transportation, either verbally or in writing, concerning its disposal or treatment or arrangement for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. If yes, describe what was requested, what was provided, when information was given, and to whom it was given. If written

documentation was given please provide a copy of that information in your response to this request.

ANSWER NO. 17: In an Illinois Pollution Control Board proceeding No. PCB 71-29, Paul Sauget testified as to the use of cinders as cover material at the Site. The files from that proceeding, and a subsequent proceeding No. PCB 77-84, which are no longer in Sauget & Co.'s or Paul Sauget's possession, may have additional information regarding the Site and responsive to this Request.

Attached documents, Bates No. SQ000410 to SQ00426, are documents from the action captioned *State of Illinois v. Paul Sauget*, (No. 81-CH-19, St. Clair County, Illinois). The entire court file, which is not in Sauget & Co.'s or Paul Sauget's possession, may have additional information regarding the Site and responsive to this Request.

In addition, Paul Sauget, in discussing permitting issues with IEPA as to the Site, may have provided information responsive to this Request. However, no documents can be found at this time in this regard.

18. According to a letter addressed to Riverport Terminal & Fleeting Company, dated June 30, 1980, during the week of May 26, 1980, a Pillsbury contractor ruptured a barrel containing a chemical substance on the Site. This container was identified as belonging to Monsanto and copies of a Monsanto internal memorandum reflected that C.F. Buckley prepared a report which was distributed to D.T. Mayer and a copy to M. Dimmitt at the Pillsbury Co. Answer the following questions pertaining to this "incident":

- (a) Completely describe the incident, including but not limited to the following: date of the incident; time; precise location (including place and depth); the names of the bulldozer drivers and other contractor employees on site at the time the incident occurred; the number and types of containers exposed or found; the markings on the containers exposed or found; the persons and companies notified of the incident; the date and time of notification; the actions of Respondent's and other person(s) or company's in response to the incident; the date, time, and method of disposal of the containers; the date, time and results of any testing of the containers; the person(s) and companies' responsible for arranging for the disposal; the person(s) and companies responsible for the actual disposal of the container(s); what legal action including any settlements, lease payment abatements or any other agreements resulting from this incident; whether any other containers were exposed during this or the completion of this project; and, when, if ever, work was resumed on the Site.**
- (b) On a copy of the attached map, please identify where the container was found:**

- (c) Please identify the contractor and all contractor and Respondent employees' (including names, addresses, telephone numbers, and titles then and now) directly or indirectly involved in this incidents.**
- (d) Please identify and provide copies of all communications and records of communication with all other parties, its employees, agents and representatives, or insurance company's concerning this incident, including but not limited to Paul Sauget, Sauget and Co., Pillsbury Company, and any and all owners, operators, lessees or the assigns of the property.**
- (e) Please state what substances were contained in the container(s);**
- (f) Describe whether Respondent has found or placed other containers or barrels on the Site. If yes, please answer questions 7(a) through 7(e) for each incident.**

ANSWER NO. 18: The incident referenced in this request appears to have occurred in 1980, which was after Sauget & Co. ceased any disposal activities on the Site. We do not have any knowledge concerning this incident nor do we have any information responsive to subparagraphs (a) through (e) concerning this incident. As to subparagraph (f), we generally recall that during the operations at the Site by Sauget & Co., there were barrels and other containers present on the Site at times but we do not recall any "incident" of the type or nature described in this request occurring with respect to such barrels or containers.